

MARK B. HANSON, ESQ.
 Second Floor, Macaranas Building
 Beach Road, Garapan
 PMB 738 P.O. Box 10,000
 Saipan, Mariana Islands 96950
 Telephone: (670) 233-8600
 Facsimile: (670) 233-5262
 E-mail Address: mark@saipanlaw.com

Attorney for *Defendant Robert A. Bisom*

IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW,

Plaintiff,

vs.

COMMONWEALTH OF THE NORTHERN
 MARIANA ISLANDS, NICOLE C. FORELLI,
 WILLIAM C. BUSH, D. DOUGLAS COTTON,
 L. DAVID SOSEBEE, ANDREW CLAYTON,
 UNKNOWN AND UNNAMED PERSONS IN
 THE CNMI OFFICE OF THE ATTORNEY
 GENERAL, PAMELA BROWN, ROBERT
 BISOM and JAY H. SORENSEN,

Defendants.

CASE NO. CV 05-00027

EX PARTE APPLICATION UNDER
 LOCAL RULE 7.1 TO INCREASE
 TIME FOR BRIEFING RE
 PLAINTIFF'S MOTION FOR
 PARTIAL SUMMARY
 JUDGMENT; CERTIFICATE
 MADE PURSUANT TO
 RULE 7.1.h.3(b);
 DECLARATION IN SUPPORT

Date: Thursday, March 17, 2007
 Time: 9:30 a.m.
 Judge: Hon. Alex R. Munson

CERTIFICATE PURSUANT TO LOCAL RULE 7.1.h.3(b)

I, MARK B. HANSON, certify as follows:

A. The address and phone number of the plaintiff, who is without counsel, is: P.O. Box 473, 1530 Trout Creek Road, Calder, Idaho 83808. Phone: 208-245-1691, no fax.

The address of the Jay H. Sorensen, c/o Shanghai, P.O. Box 9022, Warren, MI 48090-9022. Telephone: 86-21-5083-8542; Facsimile: 86-21-5083-8542.

The address of the Attorney General, who represents all the other defendants who have not been dismissed is: Office of the Attorney General—Civil Division, Second Floor, Hon. Juan A. Sablan Memorial Bldg., Caller Box 10007, Saipan, MP 96950. Phone: 670-664-2341;

I am the attorney for Robert Bisom. My address and phone are set forth above the

1 caption.

2 B. The reason this application is *ex parte* is due to the fact that there is insufficient
3 time to do a noticed motion or a written stipulation because written communication with the
4 plaintiff and other parties would take weeks and my response to plaintiff's amended complaint
5 is due on January 18, 2007. Further, good cause exists to grant the motion, as set forth in the
6 application below.

7 C. Pursuant to L.R. 7.1.h.B(1) I called plaintiff to notify him of my intention to file
8 this application on January 16, 2007, which was the evening of January 15, 2007 in Idaho,
9 where he lives. I informed Mr. Bradshaw that I would file that same motion as Mr. Sorensen
10 and request that Mr. Bisom's opposition to his Motion for Partial Summary Judgment be due
11 on the same day — February 8, 2007. He told me that he had no objection. Counsel for other
12 defendants will get notice of the filing of this Motion via the Court's electronic case filing
13 system with the exception of Mr. Sorensen whom I will inform via direct e-mail.

14 D. There has been no previous request for extensions or increases of time as to these
15 motions.

16 E. Because the hearing has been set for March 15, 2007, this additional time will have
17 no delaying effect on hearing or determination of the motion.
18

19 DATED this 16th day of January, 2007.
20

21 /s/ Mark B. Hanson

22

MARK B. HANSON

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25 Telephone: (670) 233-8600
Facsimile: (670) 233-5262
26 E-mail Address: mark@saipanlaw.com

27 Attorney for Defendant Robert A. Bisom
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APPLICATION

Defendant Robert A. Bisom, by and through his counsel of record, moves the court pursuant to Local Rule 7.1.h to extend the time for filing his opposition to plaintiff's motion for partial summary judgment by three weeks, from January 18, 2007 to February 8, 2007. Good cause exists to grant the motion, as set forth in the declaration below. A proposed order has been submitted herewith for the Court's convenience.

DATED this 16th day of January, 2007.

/s/ Mark B. Hanson

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Attorney for *Defendant Robert A. Bisom*

DECLARATION OF MARK B. HANSON

I, MARK B. HANSON, do hereby declare:

1. I am competent to testify, and if called to do so, I would testify in accord herewith.

2. I am the attorney for Robert A. Bisom in the above-captioned proceedings. I submit this declaration in support of this motion to increase the time for filing and service of the opposition to the partial summary judgment motion set be heard on March 15, 2007. The facts stated herein are of my own knowledge.

3. The motion appears to be long and complicated. It includes 25 pages of argument and some 36 exhibits. It will require more than the normal amount of time to respond to. Because the hearing is not scheduled until March 15, 2007, there is are an additional eight weeks beyond the four weeks that are prescribed in LR 7.1.c.

